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14
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

15 United States of America,
 16 Plaintiff,
 17 v.
 18 \$755,831 in United States Currency,
 19 Defendant.

2:25-CV-310-APG-DJA
 ORDER GRANTING
**Government's Unopposed Motion to
 Extend the Time to Clarify the facts of
 Oliver Jair Martinez-Mendez's Motion to
 Set Aside Clerk's Default and to Dismiss
 the Forfeiture Complaint, ECF No. 23, to
 Delay Motion for Entry of Default
 Judgment of Forfeiture, ECF No. 16, and
 Order.**

20 (First Request)

21 The United States of America respectfully moves this Court for an Order extending
 22 the time for the government to respond to, and to clarify the facts and statements of, Oliver
 23 Jair Martinez-Mendez's Motion to Set Aside Clerk's Default and to Dismiss the Forfeiture
 24 Complaint, ECF No. 23, to and including August 11, 2025.¹ The current response deadline
 25 is June 10, 2025. This is the first request.

26 The government believes the clarification will cause Mendez to withdraw the Motion
 27 to Set Aside Clerk's Default and to Dismiss the Forfeiture Complaint, ECF No. 23. The
 28 government also agrees, per Mendez's request, this Court delay entering the Motion for
 Entry of Default Judgment of Forfeiture, ECF No. 16, until after the resolution of Mendez's
 motion.

The grounds for extending the time are as follows.

¹ LR IA 6-1(a) and (c).

The government must obtain permission to provide documents to Mendez. The government does not know how long it will take to obtain permission because it is not within the government's control to grant permission to provide the documents. As soon as the government receives permission, it will provide the documents to Mendez. The government hopes this time extension will also provide Mendez sufficient time to review the documents and to withdraw the motion. If Mendez needs more time, the government agrees to extend the time. The parties have also agreed to obtain a protective order in this case for the documents when they are provided.

On May 30, 2025, Mendez's counsel, Richard Wynn, Wynn Law Group, agreed to this extension of time. The extension of time benefits both parties and this Court.

This Motion is not submitted solely for the purpose of delay or for any other improper purpose.

This Court should grant an extension of time to, and including, August 11, 2025, for (1) the government to respond to the Motion to Set Aside Clerk's Default and to Dismiss the Forfeiture Compliant and (2) for Mendez to respond to the Motion for Entry of Default Judgment of Forfeiture.

DATED: June 2, 2025.

SIGAL CHATTAH
United States Attorney

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

IT IS SO ORDERED:

Dated: June 3, 2025



ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT COURT JUDGE